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Sent: Tuesday, September 08, 2009 2:48 PM
To: Ito, Doug@ARB; Kimura, Lezlie@ARB
Subject: Comments on 2nd Draft of RTAC Report

Follow Up Flag: Follow up

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Again, I think that staff has done an excellent job of consolidating verbal and written comments from the committee, and I think the product is a comprehensive presentation of RTAC's discussions to date. My comments on the second draft are:

Page 6: points 2a and 2c and 2d: Both points need to be clarified as it is elsewhere in the document that BMP's are just one of the tools used to inform target setting and compliance reporting, and then only under certain criteria. BMP's, whether in list form or in spreadsheet sketch planning form, are not quantitatively accurate enough for final target setting. Allowing final target setting based on BMP's would place regions in a position of relying on the less accurate of two sets of numbers (one from the model and one from the BMPs) and numbers that are inconsistent with their model-based RTP analysis. The language in 2c should read "...as optional additional evidence to support model-based compliance reporting by all MPOs". As no one has asserted that BMP's are more accurate than models, the language in 2d should read "...as an additional source of information on each MPO's submittal..."

Page 6: point 3 (and similar language in middle of page 8): This concerns the statement about demonstrating compliance wherein, subject to ARB weighing the pros and cons, "MPOs have the option of using the BMP list as the sole method of demonstrating compliance". I believe we have been more specific about setting criteria through which ARB would weigh the pros and cons of allowing BMPs for compliance, which should be reflected in these statements. Before reaching the point where regions would opt to use BMPs versus modeling, ARB staff will need to set forth an action plan wherein each region undertakes an ambitious but achievable model improvements program measured against performance standards set by ARB's panel of experts and practitioners. Only in cases where a region demonstrates that, even after such a program, a BMP list is more accurate than their model would that region use BMPs instead of the model for compliance.

Page 6 last paragraph -- Implied in our discussions of the BMP list were the facts that: a) there should be a single master list of BMPs applied throughout the state, with a range of effectiveness stated for each measure recognizing the variations in effectiveness from region to region, b) that BMPs and effectiveness estimates should only be included in the list if their effectiveness is based on sufficient scientific evidence from reputable studies and if the effectiveness is reconciled against the estimated effectiveness reported by a well-calibrated regional model, and c) that the BMP list and spreadsheet be developed by January 2010 to be used by MPOs in preliminary scenario testing they will perform to inform draft targets in March.

Page 8, second and third paragraphs -- The BMP approach might be used as a public interface for formulating a transportation and land use strategy and possibly as a preliminary screening tool. However, before being used as a screening tool the BMP and any related spreadsheets need to be conservative nature, through comparison of their estimates against each region's model results. The BMPs' effectiveness estimates must be reconciled against the estimates from the regional model to demonstrate that they are reasonable and consistently conservative,

Page 8, third paragraph -- The language here and elsewhere refers to allowing small MPOs to opt to use BMPs instead of models, without defining the size of MPO to which that might apply. Consistent with CTC recommendations on modeling related to AB32, I recommend that we use a threshold based on both size and regional growth rate to identify areas where accurate tools are not achievable and not necessary. This would mean that the 4 major MPOs would not be exempt and that all fast growth regions, including the central valley would be non-exempt. As a criterion for determining which MPOs are too small to depend on models to define and evaluate their targets, I recommend, based on information provided to the RTAC in June, that a suitable threshold would be a simple growth rate below 1% per year in both population and employment.

Page 10, Step 3, second bullet -- should also encourage shifts toward more compact land use in anticipation of demographic and market trends independent of regional funding support

Page 10 step 4 -- Any argument to adjust targets at this stage should be based on credible model testing consistent with the analysis methods to be used in the RTP and RTP EIR.

Page 18 bullet at top of page – additional factors should include interregional travel, traffic speeds and induced travel

Page 21, bullet list at bottom of page --should also include “Rules, ranges and limitations of BMPs including pre-requisite conditions and critical mass for individual “

Page 22, last paragraph in section 4 -- Need to state that BMPs will not substitute for models in first round of RTPs and that it be used in subsequent RTPs only if consistency and conservativeness of can be demonstrated in first RTP modeling.

Page 21/22 under the 4 interregional travel cases – My recommendation is for : 1) 50/50 split; 2) 50/50 split between region generating trip origin and region generating the destination, with no responsibility to the pass-through region; 3) and 4) 50% to the MPO generating the one trip end and State-level responsibility for the interstate, international, tribal land, and military base trips trip end. Until regions have demonstrated that their means of estimating interregional travel are reasonable and yield consistent results for the two regions involved, it may be necessary to perform an off-model calculation for assigning GHG generation to the respective regions. The formula would be based on the jobs/housing balances of the two regions, with the jobs-rich region accepting 50% of the responsibility for the travel associated with its housing deficit.

Page 31 under item 5 “Other” – should retain statements from page 32 of first draft on modeling improvements.

Page 42, under Economic co-benefits -- I would add: lower up-front infrastructure costs for roads, parking structures, and lower associated environmental impacts

Page 43, second paragraph -- I would add: RTP modeling analysis should quantify and the RTP should report the co-benefits related to mobility, economy, air quality, safety and energy independence.